

**Case No. 15-1211  
IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

**MATT BLAIR,**  
**Appellant,**

**v.**

**JANE DOE #1, a minor, by her  
next friends and guardians,  
BEN and KELLY HOUDERSHELDT,  
and  
JANE DOE #2, a minor, by her  
next friends and guardians,  
BEN and KELLY HOUDERSHELDT,**

**Appellees.**

**MOTION TO FILE AMENDED NOTICE OF REMOVAL**

COMES NOW Defendant Res-Care, Inc., by counsel, pursuant to 28 U.S.C. § 1653, with this Motion to file the attached Amended Notice of Removal. That statute provides that defective allegations of jurisdiction may be amended in the appellate courts. As the Court is aware, there is an allegation that the statement of jurisdiction contained in the original Notice of Removal was defective. Without conceding that this is accurate, but rather to resolve any question and insure that the removal is effective, this Motion is made. The Amended Notice of Removal is attached as **Exhibit A**. Res-Care respectfully requests that this Court grant the motion and order the attached Amended Notice of Removal to be filed.

**RES-CARE, INC.**  
**By counsel,**

/s/Suleiman Oko-ogua

John P. Fuller (WV Bar #9116)

Suleiman Oko-ogua (WV Bar #10713)

Bailey & Wyant, PLLC

500 Virginia Street, East, Suite 600

Post Office Box 3710

Charleston, West Virginia 25337-3710

(304) 345-4222

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**JANE DOE #1, et al.,**  
**Appellees.**

**CERTIFICATE OF SERVICE**

I, Suleiman O. Oko-ogua, counsel for Defendant Res-Care, Inc., do hereby certify that on April 1, 2015, I served a true and correct copy of the foregoing **MOTION TO FILE AMENDED NOTICE OF REMOVAL** upon all counsel/parties of record, by filing in the Court's ECF system to the following parties:

Thomas A. Rist  
103 Fayette Avenue  
Fayetteville, West Virginia 25840

Erwin L. Conrad  
Jamison T. Conrad  
P.O. Drawer 958  
Fayetteville, West Virginia 25840  
*Attorneys for Plaintiffs*

E. Taylor George  
Michael E. Mullins  
MacCorkle Lavender, PLLC  
300 Summers St., E. Suite 800  
Charleston, WV 25301  
*Counsel for Defendant Matt Blair*

/s/Suleiman Oko-ogua  
John P. Fuller (WV Bar #9116)  
Suleiman Oko-ogua (WV Bar #10713)  
Bailey & Wyant, PLLC  
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